

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.
	)	
	)	
\$930,142.00 IN UNITED STATES	)	
CURRENCY,	)	
	)	
Defendant.	)	

**VERIFIED COMPLAINT FOR FORFEITURE**

AND NOW comes the United States of America by and through its counsel, David J. Hickton, United States Attorney for the Western District of Pennsylvania, and David Lew, Assistant United States Attorney for the Western District, and respectfully represents as follows:

1. This is a civil action in rem for the forfeiture to the United States of \$930,142.00 in United States currency (the "Defendant Property"), pursuant to 21 U.S.C. § 881(a)(6).
2. Jurisdiction is predicated upon 28 U.S.C. §§ 1345 and 1355. Venue is proper under 28 U.S.C. §§ 1395 and 1355.
3. On May 5, 2015, pursuant to a federal search warrant, the Federal Bureau of Investigation ("FBI") and state and local law enforcement officers seized the Defendant Property from the residence of Joseph Croftcheck ("Croftcheck") located in Fayette County, Pennsylvania. The Defendant Property has remained in the Western District of Pennsylvania in the custody of the United States Marshals Service.
4. The Defendant Property was found on Croftcheck's person and in various locations in the Croftcheck residence.

5. During the search, law enforcement recovered approximately two (2) ounces of cocaine, as well as packaging materials and other paraphernalia associated with drug trafficking.

6. Subsequent to the seizure, the FBI instituted administrative forfeiture proceedings against the Defendant Property. Croftcheck filed a claim to the Defendant Property as part of the administrative proceedings. As a result, the United States has instituted this civil forfeiture action against the Defendant Property.

7. Croftcheck has been the subject of an ongoing criminal investigation (the "Investigation") conducted by the FBI and others for violations of 21 U.S.C. §§ 841 and 846. The Investigation revealed that Croftcheck and others unlawfully possessed and distributed cocaine and generated thousands of dollars of illegal drug proceeds.

8. Croftcheck is currently the owner of a used-car business known as Croftcheck Auto Sales. Surveillance revealed that Croftcheck has used this business to facilitate drug transactions. Multiple individuals with known criminal histories, including drug convictions, came and went from this business on a regular basis. In addition, two of the three employees of the business operated a nearby home for the purpose of storing and distributing narcotics, as shown by the execution of a search warrant at that location. These employees would travel between the home and Croftcheck Auto Sales during business hours and meet with individuals in both locations.

9. Croftcheck is also the owner of a home that surveillance has also revealed was used to facilitate drug transactions.

10. Croftcheck has no known legitimate source of funds for the Defendant Property, and the Investigation revealed that income generated from Croftcheck Auto Sales is grossly insufficient to account for the Defendant Property.

11. The Defendant Property represents moneys furnished or intended to be furnished by any person in exchange for a controlled substance, proceeds traceable to such an exchange, and/or moneys used or intended to be used to facilitate a violation of the Controlled Substances Act, and, therefore, is forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6).

WHEREFORE, the United States of America respectfully requests that process of warrant in rem issue for the arrest of the Defendant Property; that judgment of forfeiture be entered in favor of the United States for the Defendant Property; and that the United States be granted such relief as this Honorable Court may deem just and proper, together with the costs and disbursements of this Action.

Respectfully submitted,

DAVID J. HICKTON  
United States Attorney

/s/ David Lew  
DAVID LEW  
Assistant U.S. Attorney  
700 Grant Street, Suite 4000  
Pittsburgh, PA 15219  
412-894-7482 (tel)  
412-644-2644 (fax)  
david.lew@usdoj.gov  
PA ID No. 320338 (AFF)

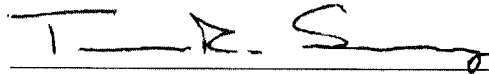
VERIFICATION

I am a Special Agent of the Federal Bureau of Investigation and have been assigned the responsibility for this case.

I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on this 9th day of OCTOBER, 2015.

A handwritten signature in black ink, appearing to read "T. R. Sweeney", written over a horizontal line.

Terrence R. Sweeney, Special Agent  
Federal Bureau of Investigation